

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
DONNA MARIE MARINO,	:	
a/k/a DONNA M. MARINO,	:	CASE NO.: 5:23-bk-01442
a/k/a DONNA MARINO,	:	
a/k/a DONNA JOHNSON-MARINO,	:	
Debtor	:	

MOTION FOR ORDER TO AMEND CHAPTER 13 PLAN
AFTER CONFIRMATION

The Motion of the above-named Debtor alleges:

1. Debtor's Chapter 13 Plan was confirmed on November 02, 2023.
2. Debtor desires to amend Debtor's Chapter 13 Plan in order to provide for additional time for Debtor's husband to find employment. He continues to look for work.
3. The Third Amended Chapter 13 Plan provides for payment of \$500.00 in additional legal fees to Newman Williams, P.C. for legal work associated with the preparation and filing of the Amended Chapter 13 Plan.
4. By reason of the foregoing, Debtor proposes that pursuant to Section 1329(a) of the Bankruptcy Code, Debtor's Chapter 13 Plan be modified as set forth in the attached proposed Third Amended Chapter 13 Plan.

WHEREFORE, Debtor prays that this Motion be granted and that Debtor's Chapter 13 Plan be modified, as set forth in this Motion.

Dated: February 20, 2024

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq.
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